

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

ABBVIE INC. et al.,

Defendants.

CIVIL ACTION

Case No. 14-cv-5151

DEFENDANTS' SUPPLEMENTAL PRETRIAL MEMORANDUM

In accordance with paragraph 7 of the Sixth Scheduling Order (Dkt. 310), Defendants have attached their Supplemental List of Exhibits Used in Deposition Counter-Designations and counter-designations to FTC's deposition designations as Appendix A and Appendix B, respectively. Defendants reserve the right to offer any document identified on FTC's amended exhibit list.

In addition, Defendants note the following errata to the exhibit list and affirmative depositions designations provided in their pretrial memorandum:

- (1) Corrected production numbers for Defendants' Exhibit 217 are AGEL-PA-006-0552005 to AGEL-PA-006-0552033;
- (2) Corrected production numbers for Defendants' Exhibit 263 are Besins-EDPA-0008063 to Besins-EDPA-0008064; and
- (3) On the Solomon affirmative deposition designations, 10:5 should be 10:6-15, 121:24-25 should be omitted from 121:5-122:4, and 202:20-25 should be 202:20-203:9.

Dated: January 5, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that, on January 5, 2018, the foregoing document was filed with the United States District Court for the Eastern District of Pennsylvania using the ECF system. The document is available for viewing and downloading.

/s/ Adam R. Lawton

Appendix A

FTC v. AbbVie Inc., No. 14-cv-5151

Supplemental List of Exhibits Used in Deposition Counter-Designations

Trial Ex. No.	BegBates	EndBates	Date	Description	Also Referenced As
DX 294	ABBOTT-FTC-00246685	ABBOTT-FTC-00246690	10/10/2010	Email and attachment regarding Product Profitability - Follow up files	IH GX 3
DX 295	ABBVIE-AGEL00342113	ABBVIE-AGEL00342191	4/18/2011	Presentation titled SMART Panel Findings for AndroGel	PX 253

Appendix B

For the following witnesses, Defendants counter-designate the following deposition testimony (including exhibits used or referenced therein):

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Maureen Cavanaugh 30(b)(6) (9/13/2016)

Start Page	Start Line	End Page	End Line
107	8	107	17
108	22	109	2
109	5	109	10
117	4	117	7
117	9	117	16
127	25	128	16
129	24	130	2
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130	11	130	14
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132	25	133	4
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240	24	241	6
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Start Page	Start Line	End Page	End Line
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304	5	304	25

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
 Defendants' Counter Deposition Designations
Maureen Cavanaugh 30(b)(6) (9/13/2016) (continued)

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Start Page	Start Line	End Page	End Line
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FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
James Hynd Volume 1 (11/02/2016)

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FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
James Hynd Volume 1 (11/02/2016) (continued)

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308	6	308	17

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
James Hynd Volume 2 (11/03/2016)

Start Page	Start Line	End Page	End Line
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FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
 Defendants' Counter Deposition Designations
James Hynd Volume 2 (11/03/2016) (continued)

Start Page	Start Line	End Page	End Line
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171	22	171	24

Start Page	Start Line	End Page	End Line
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175	14	175	16

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
James Hynd 30(b)(6) Volume 1 (11/03/2016)

Start Page	Start Line	End Page	End Line
21	17	21	21
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FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
James Hynd (30(b)(6) Volume 2 (11/04/2016))

Start Page	Start Line	End Page	End Line
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Start Page	Start Line	End Page	End Line
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FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Frank Jaeger (9/21/2012)

Start Page	Start Line	End Page	End Line
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81	13	82	4

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142	4	142	6

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Frank Jaeger 30(b)(6) 11/10/2016

Start Page	Start Line	End Page	End Line
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284	8	285	10

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Frank Jaeger 30(b)(6) 11/10/2016 (continued)

Start Page	Start Line	End Page	End Line
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FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Murray Kay (10/21/2016)

Start Page	Start Line	End Page	End Line
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FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Thomas MacAllister (10/25/2016)

Start Page	Start Line	End Page	End Line
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FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Thomas MacAllister (10/25/2016) (continued)

Start Page	Start Line	End Page	End Line
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120	18	120	20
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121	6	121	16
126	9	126	9
126	11	126	12
130	1	130	4
130	6	130	6
132	4	132	11
133	2	133	14
135	13	135	16
135	19	135	20
135	22	135	25
139	25	140	5
148	11	148	24
149	1	149	5
149	11	149	12
150	16	150	18
150	23	150	25
152	5	152	8
154	15	154	16
154	19	154	20
155	5	155	8
155	10	155	10
157	17	157	17
157	19	157	25
158	3	158	5
159	15	159	17
160	15	160	16
160	18	160	23
161	6	161	8
161	10	161	11
162	7	162	9
162	11	162	12
169	10	169	12

Start Page	Start Line	End Page	End Line
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174	5	174	25
175	2	175	10
175	12	175	22
176	22	176	23
177	1	177	6
177	8	177	10
181	16	181	18
182	21	183	16
186	19	186	22
187	12	187	20
226	20	227	7

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Joseph A. Mahoney (10/20/2016)

Start Page	Start Line	End Page	End Line
32	16	32	17
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45	17	45	24
63	16	63	24
78	21	79	3
79	12	79	15
79	17	80	14
80	17	81	9
81	25	82	4
88	17	88	20
89	1	89	11
90	2	90	5
91	1	91	7
93	5	93	9
93	13	94	13
95	3	95	15
97	1	97	12
98	3	100	14
100	25	101	12
101	25	102	4
102	6	102	8
106	3	106	23
124	15	124	24
129	11	129	14
129	19	130	15
132	1	132	14
146	4	146	12
148	25	150	4
155	17	155	20
159	5	159	8
160	23	161	14
162	11	162	14
162	19	163	4
170	21	171	4
171	6	171	7
179	5	179	8
179	10	179	10
185	17	186	13

Start Page	Start Line	End Page	End Line
186	18	187	15
187	17	189	15
189	18	190	4
190	6	190	13

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Perry Siatis (3/14/2013)

Start Page	Start Line	End Page	End Line
19	6	19	15
19	22	20	11
21	7	25	8
26	9	26	21
29	22	30	18
30	23	32	11
38	1	38	4
40	7	40	13
43	22	45	11
46	12	47	3
47	11	47	19
47	24	48	3
48	7	48	15
48	19	49	21
54	14	55	14
56	17	58	12
58	19	58	22

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Andrew Solomon (11/04/2016)

Start Page	Start Line	End Page	End Line
21	21	21	25
59	2	59	7
59	9	59	18
60	22	62	21
62	23	63	9
72	2	72	8
72	11	72	25
79	6	79	13
81	23	82	6
90	14	91	1
105	10	105	12
120	13	121	4
160	16	160	22
179	14	179	22

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Jeffrey Stewart (11/15/2016)

Start Page	Start Line	End Page	End Line
9	15	9	20
9	24	9	25
13	18	14	3
14	19	15	16
23	11	23	14
23	17	23	20
25	8	25	17
29	5	29	7
29	10	29	14
29	16	29	17
29	20	30	1
30	6	30	7
30	10	30	12
35	20	36	5
38	16	38	24
39	2	39	2
39	4	39	4
39	7	39	9
39	13	40	13
40	25	41	21
42	7	42	21
51	24	52	1
52	4	52	6
53	20	53	23
59	16	60	9
66	15	66	18
68	1	68	3
68	6	68	14
71	5	71	10
71	14	72	9
78	5	79	18
93	20	94	2
97	17	97	19
97	23	97	23
100	14	100	16
100	24	100	24
106	23	106	24
107	2	107	2

Start Page	Start Line	End Page	End Line
109	24	110	1
110	4	110	4
110	6	110	8
111	1	111	11
112	12	112	20
113	3	113	4
113	7	113	8
119	9	119	19
122	6	122	15
128	21	128	25
133	1	133	1
133	4	133	4
133	6	133	23
136	21	136	23
137	17	137	19
138	2	138	8
138	11	138	13
138	15	138	18
139	2	139	23
141	24	142	3
142	19	142	21
144	1	144	3
144	13	144	18
145	21	145	24
173	20	173	24
174	2	174	16
174	18	174	20
174	22	174	24
175	1	175	4
175	6	175	17
177	23	177	25
178	3	178	7
180	8	180	24
182	2	182	11
183	18	184	4
191	22	191	24
192	1	192	13
192	15	192	16

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Jeffrey Stewart (11/15/2016) (continued)

Start Page	Start Line	End Page	End Line
192	18	193	13
193	25	194	16
205	4	205	15
208	20	209	15
210	9	210	12
216	17	216	20
217	17	218	2
218	9	218	12
223	9	224	4
226	24	226	25
227	3	227	4
229	1	229	14
238	13	238	23
239	7	239	24
244	5	244	7
245	20	245	24
246	8	246	10
248	16	249	14
249	17	250	6

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Marianne Sutcliffe (11/08/2016)

Start Page	Start Line	End Page	End Line
15	12	15	22
16	17	16	19
16	21	17	3
17	5	17	5
17	7	17	8
17	10	18	3
22	9	22	22
23	21	23	23
23	25	24	5
24	25	25	5
25	17	27	20
30	10	31	5
31	8	31	15
36	21	36	23
37	1	37	7
37	9	37	10
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39	25	41	19
41	21	42	1
42	3	42	12
42	17	42	19
42	21	43	5
45	11	45	12
54	19	54	21
59	12	59	20
63	23	63	24
64	3	64	6
64	12	65	2
65	5	65	13
93	7	93	9
93	12	93	22
95	6	95	13
95	15	96	3
121	6	121	11
122	15	123	10

Start Page	Start Line	End Page	End Line
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127	19	127	24
139	16	140	2
140	18	140	19
140	21	140	24
141	1	141	23
149	22	151	17
151	19	152	2
167	25	168	1
168	4	168	6
168	8	168	9
168	12	168	23
168	25	169	2
169	5	169	23
173	6	173	7
173	10	173	16
199	19	200	2
200	5	200	14

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Lisa Wortsmann (10/07/2016)

Start Page	Start Line	End Page	End Line
30	11	30	14
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67	20	67	21
67	23	68	9
68	11	69	12
83	10	83	23
98	4	98	14
98	17	98	19
98	21	100	18
101	18	101	21
102	4	103	21
103	23	104	3
105	2	105	21
107	9	108	6
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108	13	108	15
108	18	109	1
112	22	112	25
113	3	113	6
114	4	114	6
114	9	114	12
137	23	138	19
146	17	147	2
152	25	153	9
153	12	153	18
177	13	178	10
204	10	204	13
204	16	204	21
204	25	205	2
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212	12	212	24
213	2	213	9
213	12	214	6
214	8	214	17

Start Page	Start Line	End Page	End Line
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215	24	216	15
216	17	216	18
216	22	216	23
223	3	223	14
239	20	241	4
241	7	241	13
241	15	242	4
242	6	242	8
242	10	242	18
258	17	259	7
259	9	260	2
260	5	261	3
261	5	261	13
271	6	272	20
272	23	272	24
273	2	273	6
273	16	273	17
273	19	273	25
274	5	274	9
274	12	274	13
275	3	275	5
275	8	275	12
276	1	276	4
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276	10	276	13
276	16	276	20
276	22	276	22
277	1	277	4
277	7	277	13
277	15	277	20
277	23	277	24
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278	11	278	11
278	13	278	18
278	21	278	21
278	23	279	3
279	6	279	6

FTC v. AbbVie, E.D. Pa. No. 14-cv-5151-HB
Defendants' Counter Deposition Designations
Lisa Wortsmann (10/07/2016) (continued)

Start Page	Start Line	End Page	End Line
279	8	279	13
279	16	279	25
280	3	280	6
280	9	280	13
280	15	280	23
281	1	281	1
281	3	281	3
281	5	281	11
281	14	281	21
281	23	282	6